

BROMBERG LAW OFFICE, P.C.

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April 29, 2021

Via ECF

Honorable Philip M. Halpern, U.S.D.J.
Eastern District of New York
300 Quarropas Street
White Plains, NY 10601-4150

Re: *Stephenson v Exclusive Motor-Sports, LLC, et al.*
SDNY Case No. 20-CV-01332 (PMH)

Dear Judge Halpern:

My office, together with co-counsel, r
referenced case.

I am writing on behalf of Ms. Stephen
Union (BFCU) to request that Your H
holding a settlement conference and th
allow the settlement conference to pro
Motor-Sports, LLC, Exclusive Motor
LLC [collectively, the "Exclusive Def
this case following the Court's grant o

Finally, in Your Honor's most recent c
May 25, 2021 and a discovery cut-off
BFCU, since all depositions were stay
owners of the Exclusive Defendants) and all discovery came to a halt when counsel for the
Exclusive Defendants moved to be relieved. Therefore, Plaintiff and BFCU request that Your
Honor extend the discovery deadline to a date after the parties have held a mediation conference
before the magistrate judge and Your Honor calendar a scheduling conference for a date more
than 60 days from today.

Respectfully,

/s/ Brian Bromberg

Brian Bromberg

cc: All Counsel of Record (Via ECF)
Saeed Moslem (Via First Class Mail)
Mehdi Moslem (Via First Class Mail)

Application granted in part. The deadline to complete discovery is extended to 6/29/2021; the telephone Case Management Conference scheduled for May 25, 2021 will proceed as scheduled. The Exclusive Defendants are again reminded that new counsel must file an appearance on their behalf in this action, as corporations may not proceed *pro se*, and the failure to do so by May 14, 2021 (see Doc. 88) may result in the entry of default judgment against them. The request for an Order of Reference to the Magistrate Judge for settlement is denied without prejudice. Plaintiff's counsel is directed to serve a copy of this Order on the Exclusive Defendants and file proof of service on the docket.

SO ORDERED.


Philip M. Halpern
United States District Judge

Dated: White Plains, New York
April 30, 2021